

1 The Honorable Marsha J. Pechman  
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8 UNITED STATES DISTRICT COURT  
9 WESTERN DISTRICT OF WASHINGTON  
10 AT SEATTLE

11 INSHA, *et al.*,

12 No. 2:25-cv-483-MJP

13 Plaintiffs,

14 STIPULATED MOTION TO HOLD  
15 CASE IN ABEYANCE AND  
16 [PROPOSED] ORDER

17 v.

18 WEEKS, *et al.*,

19 Noted for: May 12, 2025

20 Defendants.

21 Plaintiffs and Defendants, by and through their counsel of record, pursuant to Federal Rule  
22 of Civil Procedure 7 and Local Rules 7(d)(1) and 10(g), hereby jointly stipulate and move to stay  
23 these proceedings until September 1, 2025. Plaintiffs brought this litigation pursuant to the  
24 Administrative Procedure Act and Mandamus Act seeking, *inter alia*, to compel the U.S. Citizenship  
and Immigration Services (“USCIS”) adjudicate their Forms I-485, Applications to Register  
Permanent Residence or Adjust Status. Defendants’ response to the Complaint is currently due on  
on May 23, 2025. The parties are currently working towards a resolution to this litigation. For good  
cause, the parties request that the Court hold the case in abeyance until September 1, 2025.

Courts have “broad discretion” to stay proceedings. *Clinton v. Jones*, 520 U.S. 681, 706

1 (1997). “[T]he power to stay proceedings is incidental to the power inherent in every court to control  
 2 the disposition of the causes on its docket with economy of time and effort for itself, for counsel,  
 3 and for litigants.” *Landis v. N. Am. Co.*, 299 U.S. 248, 254 (1936); *see also* Fed. R. Civ. P. 1.

4 With additional time, this case may be resolved without the need of further judicial  
 5 intervention. This case involves two separate Form I-485 applications for Plaintiff Fnu Insha and  
 6 Plaintiff Avam Arora. USCIS granted Plaintiff Insha’s I-485 application for permanent residency  
 7 on May 6, 2025. USCIS issued a request for evidence (“RFE”) to Plaintiff Arora, with a response  
 8 due by August 1, 2025. Additional time is necessary to allow Plaintiff Arora to submit the response  
 9 and then for USCIS to review the response and adjudicate the application. Once USCIS has  
 10 adjudicated Plaintiff Arora’s application, claims for both Plaintiffs will be moot.

11 Accordingly, the parties request that the Court hold the case in abeyance until September 1,  
 12 2025. The parties will submit a joint status report on or before September 1, 2025.

13 Dated: May 12, 2025

14 Respectfully submitted,

15 TEAL LUTHY MILLER  
 16 Acting United States Attorney

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4  
5 *I certify that this memorandum contains 315 words, in*  
6 *compliance with the Local Civil Rules.*

7  
8 *s/ Aimei Xi*  
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15 Attorney for Plaintiffs

## [PROPOSED] ORDER

The case is held in abeyance until August 1, 2025. The parties shall submit a status update on or before August 1, 2025. It is so **ORDERED**.

PRESENTED BY:

s/Susan Kas  
SUSAN KAS, WSBA #36592  
Assistant United States Attorney  
United States Attorney's Office

s/ Aimei Xi  
AIMEI XI, WSBA# 48639  
Bright Law Firm PLLC

DATED this 20th day of May, 2025.

Wesley F. Releman

Marsha J. Pechman  
United States District Judge